

**UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD**

**INTERNATIONAL UNION OF  
OPERATING ENGINEERS,  
LOCAL 18,**

\*

Case Nos. 08-CD-135243  
08-CD-143412

\*

*Charged Party,*

\*

and

\*

**NERONE & SONS, INC. AND  
R. G. SMITH COMPANY, INC.,**

\*

\*

*Employers/Charging Parties,*

\*

and

\*

**LABORERS' INTERNATIONAL UNION  
OF NORTH AMERICA, LOCAL 310,**

\*

\*

*Party-In-Interest.*

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**LABORERS' INTERNATIONAL UNION  
OF NORTH AMERICA, LOCAL 310,**

Case Nos. 08-CD-135244  
08-CD-143415

\*

*Charged Party,*

\*

and

\*

**NERONE & SONS, INC. AND  
R. G. SMITH COMPANY, INC.,**

\*

\*

*Employers/Charging Parties,*

\*

and

**POST-HEARING BRIEF  
OF LABORERS' LOCAL 310**

\*

**INTERNATIONAL UNION OF  
OPERATING ENGINEERS,  
LOCAL 18,**

\*

\*

*Party-In-Interest.*

Laborers' International Union of North America, Local 310 ("Laborers") hereby incorporates the Employers' Post-Hearing Brief and adopts the Employers' arguments as its own.

### **CONCLUSION**

For the foregoing reasons, the Board should award the work in dispute to the employees represented by the Laborers on all projects with Local 18's territorial jurisdiction.

*Dated May 1, 2015 at City of Cincinnati, Hamilton County, Ohio.*

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing brief was served this 1st day of May 2015 via the NLRB's electronic filing system upon the following:

NLRB REGION 08 – CLEVELAND, OH

And electronic mail upon the following:

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s/Ryan K. Hymore

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